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UNITED STATES DISTRICT COURT

IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANA MARTINEZ,

Defendant.

Case No.: 2:11-CR-00310-JCM-RJJ

**MOTION TO MODIFY PRETRIAL
CONDITIONS OF SUPERVISION**

MOTION TO MODIFY PRETRIAL CONDITIONS OF SUPERVISION

COMES NOW, ANA MARTINEZ, (MARTINEZ) through her attorney, GABRIEL L. GRASSO, ESQ., and respectfully moves this Honorable Court for a Motion to Modify Pretrial Conditions of Supervision.

POINTS AND AUTHORITIES

Defendant was placed on Pretrial Supervision with the stipulation that she would be required to stay away from her Co-Defendant, Jacob Lill, as part of pretrial conditions. Jacob Lill is Ms. Martinez's long time boyfriend whom she shared a residence with before her indictment in this matter. It is requested that any order to stay away from Jacob Lill be lifted.

Following the filing of the Indictment, there is no identifiable reason which has relevance to the prosecution of this case which would require that these two defendant's, MARTINEZ and Lill, be prevented from having contact and living together pending trial.

CONCLUSION

The Defendant respectfully prays that this motion be granted to lift any restrictions to see Jacob Lill.

DATED this 12th day of September, 2011.

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/s/
GABRIEL L. GRASSO, Esq.

This Motion is based on the attached Points and Authorities and any evidence and/or argument that may be adduced at a hearing in this matter.

DATED this 12th day of September, 2011.

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/s/
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